REGISTRATION AMENDMENT CONCEPTS
FOR DISCUSSION PURPOSES ONLY

The body of scientific information supporting EPA's approval of XtendiMax Herbicide is clear—when used according to label directions XtendiMax satisfies all standards necessary for pesticide registration. In order to further amplify the existing registration requirements and labelled directions for use, we propose a discussion around the following compliance monitoring program.

I. Enhanced Training Program Overview

The current XtendiMax label requires the following: "Prior to applying this product in the 2018 growing season and each growing season thereafter, applicator(s) must complete dicamba or auxin-specific training. If training is available and required by the state where the applicator intends to apply this product, the applicator must complete that training. If the state where the application is intended does not require auxin or dicamba-specific training, then the applicator must complete dicamba or auxin-specific training provided by one of the following sources: a) a registrant of a dicamba product approved for in-crop use with dicamba-tolerant crops, or b) a state or state-authorized provider."

In cooperation with states or state authorized providers, Monsanto proposes to increase the number of live in person training opportunities. In addition, as set forth below, to enhance the effectiveness of the training programs identified herein, registrant proposes specific registration terms and conditions that: (1) obligates registrant to take specified measures to continuously improve the education program; (2) obligates registrant to encourage and evaluate reported concerns, inquiries or complaints regarding off-target movement through appropriate follow-up contacts, including field visits where appropriate; (3) obligates registrant to report to EPA on aspects of its training and education program; (4) obligates registrant to report to EPA any evaluations of inquiries/complaints; and (4) obligates registrant to work with states as appropriate to supplement training in any necessary respects to ensure continued applicator compliance.

II. Enhanced Training Elements

1. In-person Training: In cooperation with states or state authorized providers the registrant will take steps to supplement existing training programs with additional in-person training opportunities and appropriate support for in-person training programs required by states.
2. Multi-media Campaign: In cooperation with states or state authorized providers, the registrant will identify opportunities to publicize the importance of label compliance through a Dicamba Stewardship Media Campaign. The Dicamba Stewardship Media Campaign shall be in addition to the required training sessions imposed by the XtendiMax label, and shall include efforts to reach XtendiMax users through the use of multiple media, e.g. face-to-face meetings, mailing written materials, emphasizing XtendiMax label compliance, and electronic communications such as by Internet, radio, or television commercials.
3. Continuous Improvement: The registrant shall revise as necessary its education program to take into account information collected through the Inquiry Management Process discussed in Section III below, and survey results of education program participants. The registrant shall confer with other registrants and EPA on such revisions prior to implementation.

4. Annual Reporting: The registrant shall report annually to EPA the number of in-person training opportunities it has facilitated, improvements made to its education program, and the principal elements of its multi-media campaign.
5. Records: Registrant shall maintain records of training materials and elements of the Dicamba Stewardship Media Campaign sufficient to enable EPA to audit Registrant's annual report.

III. Required Inquiry Management Process

1. Encourage Reporting: In order to ensure that the effectiveness of training is continually assessed and improved, registrant shall publicize and encourage applicators and non-applicators to contact the registrant directly through a toll-free number to report any concerns or inquiries related to the off-target movement (OTM) of XtendiMax.
2. Site Visits: Registrant shall ensure a systematic process timely addresses and evaluates each inquiry, including, where feasible, on site visits to collect specified data. Specific processes and data to be collected include the following: measure of any symptomology reported, document the nature of any such symptomology, and document the extent of reported or observed label compliance.
3. Annual Reporting: Registrant shall report annually to EPA on the number of OTM inquiries it received, the number of OTM inquiries it processed, the total amount of symptomology observed and measured, the nature of such symptomology, and the extent of reported or observed label compliance.
4. Records: Registrant shall maintain records redacted of personally identifiable information that are sufficient to enable EPA audit to audit Registrant's annual inquiry report.